UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF GEORGIA AUGUSTA DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:22-cr-0107
)	
DANYELLE ALLISON LOGAN)	
)	

JOINT MOTION FOR CONTINUANCE OF TRIAL

NOW COMES the United States of America, by and through Jill E. Steinberg, United States Attorney for the Southern District of Georgia, and the undersigned Assistant United States Attorney, and counsel for Defendant, to move for a continuance of jury selection and trial in this case as follows:

- 1. On March 22, 2023, this Court set this case for jury selection and trial for April 10, 2023 at 9:00 a.m. in Augusta, Georgia.
- 2. On March 28-30, 2023, Assistant United States Attorney Jennifer A. Stanley completed a jury trial in *United States v. Okojie* (No. 4:22-cr-084) in the Southern District of Georgia, specifically in Brunswick, Georgia, before the Honorable Lisa Godbey Wood.
- 3. The parties have been engaged and are engaged in active plea negotiations and submit that a non-trial disposition is very likely. The parties expect that a signed plea agreement will be presented to the court within 30 days.
 - 4. The parties believe that a 31-day period will be sufficient to determine

if a non-trial disposition of the case is possible. If for some reason a non-trial disposition cannot be reached, both parties will require additional time to adequately prepare for trial. See 18 U.S.C. § 3161(h)(7)(B)(iv) (factor to consider is "[w]hether the failure to grant such a continuance in a case . . . would deny counsel for the defendant or the attorney for the Government the reasonable time necessary for effective preparation, taking into account the exercised of due diligence").

5. Based on the above, the parties agree and submit that the ends of justice would be served by this continuance and that such continuance outweighs the best interest of the public and the defendant in a speedy trial. See 18 U.S.C. § 3161(h)(7)(A).

For the above reasons, the parties respectfully requests that this Court grant a 31-day continuance of trial, up to and including May 1, 2023.

Respectfully submitted, this 31st day of March, 2023.

JILL E. STEINBERG UNITED STATES ATTORNEY

s/ Jennifer A. Stanley

Jennifer A. Stanley Assistant United States Attorney Alabama Bar No. 8400E77T United States Attorney's Office Southern District of Georgia Post Office Box 2017 Augusta, Georgia 30903 T: (706) 826-4525 jennifer.stanley@usdoj.gov

s/Grant D. Usry

Grant D. Usry The Usry Firm, P.C. 1450 Greene St., Ste. 130 Augusta, GA 30901 T: (706) 739-7070 grant@theusryfirm.com